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BEFORE THE ARIZONA CORPORATION COMMISSIONED

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CARL J. KUNASEK

Commissioner

Commissioner

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

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Arizona Corporation Commission DOCKETED

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AZ CORP COMMISSION DOCUMENT CONTROL

DOCKETED BY

IN THE MATTER OF THE COMPETITION IN THE PROVISION OF ELECTRIC SERVICES THROUGHOUT THE STATE OF ARIZONA

IN THE MATTER OF THE FILING BY CITIZENS UTILITIES COMPANY OF UNBUNDLED AND STRANDED OFFER SERVICE TARIFFS PURSUANT TO A.A.C. R14-2-1606 DOCKET NO. RE-00000C-94-0165

DOCKET NO. E-01032C-97-0774

APPLICATION FOR INTERVENTION

Pursuant to Ariz. Admin. Code R14-3-105 of the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), Arizona Public Service Company ("APS") hereby applies for leave to intervene in the above-captioned docket.

APS is an Arizona corporation with its principal office in the Phoenix, Arizona. It owns and operates facilities for the generation, purchase, transmission, distribution and sale of electricity to customers in various areas of the state.

APS is a participant in Docket No. RE-00000C-94-0165.

APS may be directly and substantially affected by the issuance of any orders or decisions in this proceeding because APS is an Affected Utility under the Retail Electric Competition Rules pursuant to AAC. R14-2-1601, *et seq*.

APS's intervention will not unduly broaden the issues of this proceeding.

The name, mailing address and telephone number of the person upon whom service of all pleadings, motions and other documentation is to be made is:

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Steven M. Wheeler Snell & Wilmer, LLP One Arizona Center Phoenix, AZ 85004 (602)382-6327 (602)382-6070 (fax)

and

Barbara J. Klemstine Arizona Public Service Company 400 North 5th Street Phoenix, Arizona 85072-3999 (602)250-2031 (602)250-3399 (fax)

RESPECTFULLY SUBMITTED this _____ day of July, 1999.

SNELL & WILMER L.L.P.

Steven M. Wheeler Thomas L. Mumaw Jeffrey B. Guldner

Attorneys for Arizona Public Service Company

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CERTIFICATE OF SERVICE

The original and ten (10) copies of the foregoing document were filed with the Arizona Corporation Commission on this day of July, 1999, and service was completed by mailing or hand-delivering a copy of the foregoing document this day of July, 1999, to all parties of record herein.

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